

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION**

Cecilia Hurtado,

Plaintiff,

v.

Alupress LLC,

Defendant.

Case Number: _____

**State Court Civil Action No:
2018-CP-30-00551**

**DEFENDANT’S RESPONSE TO
LOCAL RULE 26.01
INTERROGATORIES**

Pursuant to Local Rule 26.01, Alupress LLC (“Defendant”), by and through its undersigned counsel, answers the Court’s local interrogatories as follows:

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE: None known at this time.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

RESPONSE: Plaintiff’s Complaint demands a jury trial and Defendant does not dispute the causes of action pled give rise to a jury trial.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

RESPONSE: Not Applicable.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

RESPONSE: Defendant removed this case to the Greenville Division because the Plaintiff originally filed this case in the Laurens County Court of Common Pleas.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE: None known at this time.

(F) [Defendants only.] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE: Defendant is properly identified.

(G) [Defendants only.] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

RESPONSE: None known at this time.

[SIGNATURE BLOCK ON FOLLOWING PAGE]

s/ Pierce T. MacLennan

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September 7, 2018

Spartanburg, South Carolina